

## REMARKS

### I. Introduction

In response to the Office Action dated December 9, 2005, claims 4, 13 and 22 have been canceled, and claims 1, 5-6, 10, 14-15, 19 and 23-24 have been amended. Claims 1-3, 5-12, 14-21 and 23-27 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

### II. Prior Art Rejections

#### A. The Office Action Rejections

In paragraphs (1)-(2) of the Office Action, claims 1-27 were rejected under 35 U.S.C. §102(b) as being anticipated by Melchione et al., U.S. Patent No. 5,930,764 (Melchione).

Applicants' attorney respectfully traverses these rejections.

#### B. The Applicants' Independent Claims

Independent claims 1, 10 and 19 are directed to a method, system and article of manufacture for generating analytic data sets for use in modeling in customer relationship marketing. Claim 1 is representative, and comprises a computer-implemented method of generating analytic data sets for use in modeling in customer relationship marketing, comprising: (a) specifying one or more Variable Groups, wherein the Variable Group is a set of Analytic Variables with similar characteristics and the Analytic Variables are comprised of both primitives and conditions; (b) creating an Analytic Data Set Template containing one or more of the Analytic Variables selected from the specified Variable Groups and required for a specific analysis task, wherein execution conditions are defined for the Analytic Data Set Template; and (c) generating instructions to retrieve the Analytic Variables contained in the Analytic Data Set Template from a database.

#### C. The Melchione Reference

Melchione describes a sales process support system and method for identifying sales targets using a centralized database to improve marketing success. The system includes a central database that receives comprehensive information from a variety of internal and external feeds, and standardizes and households the information in a three-level hierarchy (households, customers, and accounts) for use by a financial institution. The comprehensive information stored on the central database is accessed through micromarketing workstations to generate lists of sales leads for

marketing campaigns. A database engine is provided for generating logical access paths for accessing data on the central database to increase speed and efficiency of the central database. The system distributes sales leads electronically to branch networks, where the sales leads are used to target customers for marketing campaigns. The central database is accessed by workstations of a central customer information system for profiling customers, enhancing customer relationships with the financial institution, and electronically tracking sales and service performance during marketing campaigns. The system can also include a system for opening an account in a single session that is in communication with the central database, micromarketing centers, central customer information systems and branch systems of the present invention so that data can pass between these systems where legal and appropriate.

D. Applicants' Independent Claims Are Patentable Over The References

Applicants' invention, as recited in independent claims 1, 9 and 17, is patentable over the Melchione reference, because the claims recite limitations not found in the reference.

Nonetheless, the Office Action states the following:

As per claim 1,10 and 19, Melchione teaches generating data sets (column 5, line 34: "database" which contains sets of data) for use in customer relationship marketing (column 5, lines 55-57: "target optimum groups of customers for each marketing campaign conducted.") comprising: specifying one or more variable groups (column 20, line 1-2: "summary variables"), where the group is a set of analytic variables with similar characteristics (column 20, line 4: "characteristics" whereby the data is sorted according to set characteristics it has in common); creating an analytic data set template containing one or more of the analytic variables selected from the specified variable groups (column 17, lines 62-67: "If the user requests and saves the keys, the user can then use the saved keys to pick up different set of fields (using the data extractor component of the database engine) at different times. Alternatively, the user can further reduce the set of keys (and save the new set, instead of, or in addition to the old set of keys) by applying additional criteria to the old set." Where the data extractor is used as a template for entering search criteria.); and generating instructions to retrieve analytic variables contained in the template from the database (column 18, lines 2430: The data extractor component of the database engine 40, which can execute alone or with the first key extract component, has the function of pulling the desired data from the database once the keys have been extracted. If it executes with the first component, the keys may not even have to be saved on a table but passed through host program variables from previous SQL statements.").

Applicants' attorney disagrees.

For example, at the locations indicated above, Melchione does not teach or suggest the claim limitations directed to “specifying one or more Variable Groups, wherein the Variable Group is a set of Analytic Variables with similar characteristics and the Analytic Variables are comprised of both primitives and conditions.”

Nowhere does Melchione describe anything related to the Analytic Variables.

When Melchione refers to a “three-tier hierarchy” and “positive conditions,” this is not equivalent to an Analytic Variable comprised of both a primitive and condition. Instead, the “three-tier hierarchy” merely describes how the information is maintained in a database, so that it may be accessed selectively at household, customer and account levels, while the “positive conditions” merely refer to complement and general limiting criteria used in queries, such as the NOT IN or NOT CONTAINS logic or functions.

As noted in the Applicants’ dependent claims, the primitives of the Analytic Variables comprise base variables and the conditions of the Analytic Variables comprise predicates, aggregates or functions. No similar elements are similarly grouped and defined within Melchione.

In another example, at the locations indicated above, Melchione does not teach or suggest the claim limitations directed to “creating an Analytic Data Set Template containing one or more of the Analytic Variables selected from the specified Variable Groups required for a specific analysis task, wherein execution conditions are defined for the Analytic Data Set Template.”

Nowhere does Melchione describe anything related to the Analytic Data Set Templates.

Instead, Melchione merely describes creating and saving keys, which are indexed fields that are used to select and extract data from a database, and a data extractor function that performs the extraction. However, saved keys are not an Analytic Data Set Template, because saved keys do not contain Analytic Variables comprised of both primitives and conditions. In addition, the data extractor function of Melchione is not an Analytic Data Set Template, but instead merely comprises a module that performs a function, i.e., extraction of data from the database.

In Applicants’ invention, an Analytic Data Set Template is a construct that groups related Analytic Variables required for a specific analysis task. Moreover, execution conditions can be defined for the Analytic Data Set Template. No similar elements are defined within Melchione.

Consequently, the Melchione reference does not describe generating analytic data sets for use in modeling in customer relationship marketing by specifying one or more Variable Groups, wherein the Variable Group is a set of Analytic Variables with similar characteristics and the Analytic Variables are comprised of both primitives and conditions; creating an Analytic Data Set

Template containing one or more of the Analytic Variables selected from the specified Variable Groups and required for a specific analysis task, wherein execution conditions are defined for the Analytic Data Set Template; and then generating instructions to retrieve the Analytic Variables contained in the Analytic Data Set Template from a database.

As noted in the Applicants' specification, the execution conditions of the Analytic Data Set Template comprise scheduling the Template for later execution or executing the Template on an ad-hoc basis. No similar elements are similarly grouped and defined within Melchione.

Thus, Applicants' attorney submits that independent claims 1, 10 and 19 are allowable over the Melchione reference. Dependent claims 2-3, 5-9, 11-12, 14-18, 20-21 and 23-27 are submitted to be allowable over the Melchione reference in the same manner as the independent claims, because they are dependent on independent claims 1, 10 and 19, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-3, 5-9, 11-12, 14-18, 20-21 and 23-27 recite additional novel elements not shown by the Melchione reference.

### III. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.


Respectfully submitted,

GATES & COOPER LLP  
Attorneys for Applicant

Howard Hughes Center  
6701 Center Drive West, Suite 1050  
Los Angeles, California 90045  
(310) 641-8797

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GHG/

By:   
Name: George H. Gates  
Reg. No.: 33,500

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